

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK (ROCHESTER)**

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JONATHAN PAUL CATLIN,  
Plaintiff,

CASE NO. 6:15-cv-06258-DGL

vs.

VIKING CLIENT SERVICES, INC. and  
TRANS UNION CONSUMER SOLUTIONS,  
Defendants.

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**TRANS UNION, LLC'S INITIAL DISCLOSURES**

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Pursuant to FED. R. CIV. P. 26(a)(1), Trans Union, LLC (“Trans Union”), by counsel, makes its mandatory initial disclosures as follows:

**A. The name, address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.**

| <b><u>NAME</u></b>  | <b><u>SUBJECT OF INFORMATION</u></b>   | <b><u>CONTACT INFO</u></b>                                    |
|---|--|---|
| Shameek Williams  | Trans Union's consumer relations procedures including consumer requests for reinvestigation, Plaintiff's contacts with Trans Union and Trans Union's records related to those contacts.  | c/o Counsel For Trans Union, LLC, Schuckit & Associates, P.C. |
| Plaintiff Jonathan Paul Catlin  | Knowledge of the basis of Plaintiff's claims.  | c/o Counsel for Plaintiff, <i>Pro Se</i>                      |
| Representatives and/or Keeper of the Records of any entity with which Plaintiff alleges to have applied for credit or received Plaintiff's credit report. | May have knowledge regarding the ownership of certain tradelines, the information reported on certain tradelines, and/or other information related to Plaintiff's allegations, including the basis of Plaintiff's claims regarding alleged denials of credit or damages. | Unknown at this time.   |

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|--|--|-------------------------------|
| Representatives and/or Keeper of the Records of any entity which provided information to Trans Union, which information Plaintiff alleges was inaccurate.                  | May have knowledge of the basis of Plaintiff's claims regarding ownership of certain tradelines, the information reported on certain tradelines, and/or other information related to Plaintiff's allegations.  | Unknown at this time.         |
| Representatives and/or Keeper of the Records of Co-Defendant.  | May have knowledge regarding the ownership of certain tradelines, the information reported on certain tradelines, and/or other information related to Plaintiff's allegations including the basis of Plaintiff's claims regarding alleged denials of credit. | c/o Counsel for Co-Defendant. |
| Any family members of Plaintiff.   | May have knowledge of factual basis for all claims and defenses.   | Unknown at this time.         |
| Any witnesses identified in Plaintiff's and Co-Defendant's Initial Disclosures and all supplements thereto or in any of Plaintiff's or Co-Defendant's discovery responses. | As specified therein.  | As specified therein.         |

**B. A copy of, or description by category and location of all documents, data compilations, and tangible things that are in the possession, custody or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.**

Trans Union's records regarding the Plaintiff, including correspondence between the Plaintiff and Trans Union, records regarding Trans Union's reinvestigation of items on Plaintiff's consumer report, including automated consumer dispute verifications and information reported by the Plaintiff's creditors.

**C. Itemization of Damages.**

At the present time Trans Union is not seeking damages from any party. However, Trans Union reserves the right to seek reimbursement of costs, including but not limited to attorneys' fees, should it prevail in this matter.

**D. Insurance.**

Trans Union's applicable insurance carrier is Underwriters at Lloyd's, London. Based on Plaintiff's claims it appears likely that any judgment against Trans Union would be subject to Trans Union's self-insured retention category.

Respectfully submitted,



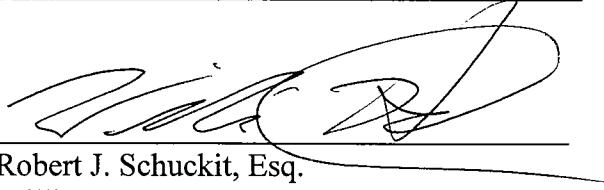
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*Counsel for Defendant, Trans Union, LLC  
(improperly identified as Trans Union  
Consumer Solutions)*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **20th day of July, 2015**, properly addressed as follows:

| <b><u>Pro Se Plaintiff</u></b>                           | <b><u>for Defendant Viking Client Services, Inc.</u></b>                                       |
|--|--|
| Jonathan Paul Catlin<br>P.O. Box 621<br>Naples, NY 14512 | Arthur Sanders, Esq.<br>Barron & Newburger, P.C.<br>30 South Main Street<br>New City, NY 10956 |



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